



Parkway Law

SARA J. PETERSON, ATTORNEY

1241797 - R8 SDMS

August 31, 2012

VIA EMAIL AND U.S. EXPRESS MAIL

U.S. Environmental Protection Agency, Region 8
Attn: Judith Binegar (8ENF-RC)
1595 Wynkoop Street
Denver, Colorado 80202-1129
binegar.judith@epa.gov

Re: Section 104(e) Request for Information regarding Highway 89 Storage Units, Site #08-SK

Dear Ms. Binegar:

I have enclosed for your review ATK Aerospace Systems' Response to EPA's June 27, 2012 Request for Information regarding the above-referenced site and a notarized certificate regarding the Response from ATK Aerospace Systems Senior Counsel Olga Siggins. As requested, we are providing copies of relevant documents to accompany each of ATK's written responses to the questions posed by EPA. Per my discussion with Mr. Richard Sisk, the documents are being provided in electronic format. Due to their size, I am enclosing them on a CD sent via mail.

Also per my discussion with Mr. Sisk, we have included electronic copies of several files documenting John Rahkonen's and his company Propulsion Dynamic's purchases of materials from Thiokol in surplus property sales, but have not to date copied or scanned all of the existing files. We have included a spreadsheet prepared based on all of the files, which summarizes Mr. Rahkonen's and Propulsion Dynamic's successful and unsuccessful bids documented in the files. We will provide additional bid files upon EPA request.

Finally, we have one series of internal Thiokol correspondence that we are still reviewing to determine whether it contains attorney-client privileged communications. We will provide any non-privileged documents as a supplement to this Response as soon as we are able to confirm that they are not privileged.

August 31, 2012



If you have additional questions or requests related to this Response, please contact me at (763) 226-6168 or sara.peterson@parkwaylaw.com. Thank you.

Yours truly,

A handwritten signature in cursive script, appearing to read "Sara Peterson".

Sara J. Peterson

cc: Olga Siggins, ATK Aerospace Systems
Richard Sisk, EPA Region 8

ENCLOSURE 2

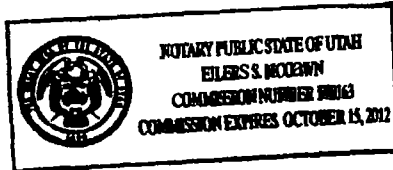
NOTARIZED CERTIFICATE

I, Olga B. Siggins, having been duly sworn and being of legal age, hereby state:

1. I am the person authorized by ATK Aerospace Systems to respond to the Environmental Protection Agency's (EPA's) request for information concerning the Highway 89 Storage Units Site located in Box Elder and Weber Counties, Utah.
2. I have made a complete and thorough review of all documents, information, and sources relevant to the request.
3. I hereby certify that the attached response to EPA's request is complete and contains all information and documents responsive to the request.

Olga B. Siggins
(Signature)
Olga B. Siggins
(Name)
Senior Counsel
(Title)

(SEAL)



Subscribed and sworn to me
this 30th day of August, 2012.

Eileen McCann
Notary Public

My Commission Expires October 15, 2012
My address is 5000 South 8400
Magna, UT 84044

**RESPONSE TO 104(e) INFORMATION REQUEST
HIGHWAY 89 STORAGE UNITS, BOX ELDER AND WEBER COUNTIES, UTAH
SITE ID: G8-SK**

1. Identify the person(s) answering these Questions by providing their name, address, fax and telephone number.

RESPONSE #1:

Olga B. Siggins
Senior Counsel & Director, Human
Resources
Propulsion Systems
ATK Aerospace Systems
P.O. Box 98; M/S D2HR
Magna, Utah 84044-0098
(801) 251-2205
olga.siggins@atk.com

Sara J. Peterson, Esq.
Parkway Law LLC
1925 Innsbruck Parkway
Minneapolis, MN 55421
(763) 226-6168
sara.peterson@parkwaylaw.com

2. Identify the person(s) whom you wish to receive all further communications from the EPA related to this Information Request or Site.

RESPONSE #2: Olga Siggins and Sara Peterson; contact information is listed in Response #1 above.

3. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

RESPONSE #3: For each Question, any specific persons consulted in preparation of the response are listed after the response is provided. Where no individuals are listed, the response relies solely on documents reviewed, as no one with personal knowledge was identified among current employees. Employees who assisted in reviewing files and collecting information responsive to this request include:

Jill Wilde, Certified Paralegal
Loril Stephens, Manager, Property Management
George Gooch, Director, Environmental
Kerry Coleman, Senior Manager, Security
Kevin Thackeray, Associate Engineer
Steve Bradley, Senior Manager, Mission Assurance Engineering
Brad Cragun, Scientist

Addresses and phone numbers for these employees will be provided upon EPA request.

4. For each and every Question contained herein, identify documents consulted, examined, or referred to in the preparation of the answer or that contains information responsive to the Question and provide accurate copies of all such documents.

RESPONSE #4: For each Question, documents consulted in preparation of the response are listed after the response is provided. Electronic copies of documents collected and examined in preparing these responses are being provided in conjunction with this response. As discussed with Mr. Richard Sisk, representative samples of bid documents for hazardous chemicals and other raw materials have been provided in response to Questions 10-13 and 16-18 below, along with a spreadsheet summarizing all the bid files where Mr. Rahkonen was found to have submitted successful or unsuccessful bids. Copies of additional bid documents will be provided to EPA upon request

5. What was Respondent's association with John Rahkonen.

RESPONSE #5: John Rahkonen was employed by Thiokol Chemical Corporation (later renamed Morton Thiokol, Inc.) as an associate chemist in Thiokol's research and development laboratory from April 1961 through May 1968. See Rahkonen Personnel File at 15-16. After being laid off in May 1968, Mr. Rahkonen was re-hired as a laboratory technician for Thiokol's propellant development department in November 1968. See *id.* at 19. Mr. Rahkonen retained his position as a laboratory technician at Thiokol until he retired from the company in January 1990. See *id.* at 50. Respondent ATK Aerospace Systems (ATK) acquired the Thiokol Propulsion business from Alcoa Inc. in 2001.

Mr. Rahkonen also owned and operated a company called Propulsion Dynamics, Inc., with an address of 2766 North 1050 East in Ogden, Utah, and an EPA identification number listed as #UTD07301774. Propulsion Dynamics, also known as ProDyne, was a supplier of model rocket kits and motors. Mr. Rahkonen first registered the company with the State of Utah in 1963, and its registration status expired due to nonrenewal on May 3, 2011. See Utah Business Search on Propulsion Dynamics (Aug. 28, 2012).

ATK has never owned, operated, or had any financial interest in Propulsion Dynamics and, to the best knowledge of Respondent, Thiokol never owned, operated or had any financial interest in Propulsion Dynamics. Thiokol sold supplies, equipment and raw materials to Propulsion Dynamics, and to John Rahkonen on behalf of Propulsion Dynamics, when he successfully bid on such materials through a sealed bidding process for surplus government-owned and Thiokol-owned property described in Response #10, below.

Based on records reviewed, Thiokol conducted hazardous material surveys of companies on the approved bidder list for surplus hazardous materials in 1981, in order to determine whether they should remain on the approved bidders list. The records indicate that improper storage of hazardous materials was found at the Propulsion Dynamics facility surveyed. As a result, Thiokol removed Mr. Rahkonen and Propulsion Dynamics from the approved bidders list for hazardous materials. Mr. Rahkonen and Propulsion Dynamics were still allowed to bid on open (non-restricted) items in the surplus material auctions.

After identifying the hazardous material storage problems at Propulsion Dynamics' storage areas, and again after a fire occurred at one of the facilities in 1984, Thiokol voluntarily assisted Rahkonen and state and federal regulators in efforts to clean up and remove materials stored by Rahkonen and Propulsion Dynamics at the sites.

Individuals consulted: Loril Stephens, George Gooch, Kevin Thackeray, Steve Bradley

Documents consulted:

- Rahkonen Personnel File (1961-1990)
- Utah Business Records Search on Propulsion Dynamics Incorporated (Aug. 28, 2012)
- Rahkonen-PD Bid Files (see Response #13, below)
- Rahkonen/Propulsion Dynamics 1981 hazardous materials survey and related correspondence regarding clean up of storage sites (1981-1984) (hereinafter "Rahkonen-PD HazMat File")
- In re Highway 89 Storage Units Site, Administrative Settlement Agreement and Order on Consent for Removal Action between ATK Launch Systems, Inc. and EPA Region 8 (Nov. 18, 2009)

6. **What were the dates of Mr. Rahkonen's employment with Respondent?**

RESPONSE #6: Mr. Rahkonen was employed by ATK predecessor Thiokol from April 1961 to May 1968, and then from November 1968 to January 1990.

Documents consulted: Rahkonen Personnel File pp. 15-19, 23, 49-50

7. **What was Mr. Rahkonen's job title while employed with Respondent?**

RESPONSE #7: Mr. Rahkonen held the position of Associate Chemist with Thiokol from April 1961 to May 1968, and Laboratory Technician "A" (Lab Tech A) from November 1968 to January 1990.

Documents consulted: Rahkonen Personnel File pp. 15-19, 23, 49-50.

8. **What were Mr. Rahkonen's job duties while employed with Respondent?**

RESPONSE #8: According to a 1968 job application form in Mr. Rahkonen's personnel file, his duties as an Associate Chemist from April 1961 to May 1968 were as follows:

Conducted laboratory research for the development of improved solid propellants having higher energies, lower viscosities and superior mechanical properties. Supervised the static firing of small test motors, reduced data and modified ballistic properties to develop propellant having the required characteristics. Evaluated new types of metallic additives and oxidizer types to ascertain their effect upon propellant ballistic, physical and rheological properties. Conducted liner studies and effect of aging and various ingredients upon the bonding of liner to propellant. Tested and evaluated burning rate catalysts and ballistic modifiers. Conducted tests of new grain configurations which increase overall motor performance. Directed the research of propellant formulations which resulted in developing a high performance, low viscosity propellant for the Large Space Booster Program.

According to a 1986 resume in Mr. Rahkonen's personnel file, his duties as a Lab Tech A for Thiokol were as follows:

Conducted laboratory tests upon advanced solid propellants to determine mechanical and physical properties and energy levels. Developed a thorough knowledge of all types of laboratory test apparatus and equipment both electronic and mechanical. Experience on: High Energy Cross-linked Double Base Propellant;

Shuttle Booster Propellant; Low Radar Attenuation Propellant, and Propellant Extinguishment program.

Documents consulted: Rahkonen Personnel File at 15-16 and 191-194.

9. **Did Mr. Rahkonen have physical access to materials used at Respondent's facilities?**

RESPONSE #9: Based on his personnel file, Mr. Rahkonen's duties required physical access to materials used at Thiokol's research and development laboratory.

Individuals consulted: George Gooch, Kevin Thackeray, Steve Bradley, Brad Cragun

Documents consulted: Rahkonen Personnel File

10. **Was Mr. Rahkonen allowed to purchase materials from Respondent?**

RESPONSE #10: Based on property records, Mr. Rahkonen purchased surplus government-owned and Thiokol-owned supplies, equipment and raw materials through an auction process undertaken by Thiokol in accordance with the Armed Forces Procurement Regulations (ASPR) applicable to surplus property, the requirements of Thiokol's federal government contracts, and Thiokol corporate policy for the disposition of surplus property. Sales of surplus government-owned property were undertaken at the direction and approval of the Defense Contract Management Agency's (DCMA's) Plant Clearance Officer. Most of Mr. Rahkonen's and Propulsion Dynamics' purchases were made through sealed bidding. Based on review of the purchasing records, Mr. Rahkonen also was permitted to purchase materials from Thiokol in a series of direct negotiated sales in 1980 and 1981.

Based on the property records, Mr. Rahkonen and Propulsion Dynamics were listed as approved bidders on surplus hazardous chemicals and materials until Thiokol removed them from the approved bidders list after touring and identifying improper storage at a Propulsion Dynamics storage facility in late 1981.

Documents consulted:

Thiokol Surplus Property Policies:

- Thiokol Corporation Corporate Policy 6.203, *Facilities Management – Disposal of Surplus Property* (Issued Feb. 5, 1979, originated June 26, 1964)
- Morton Thiokol, Inc., Wasatch Operations, Management Procedure #2450-32-01009 Issue #13, *Supplies; Declaring Excess and Disposal of* (May 6, 1986)
- Morton Thiokol, Inc., Wasatch Operations, management Procedure #2420-32-01026, Issue 6, *Facilities (Government-Owned); Declaring Excess and Disposing of* (June 16, 1986)
- Morton Thiokol, Inc., Wasatch Operations, management Procedure #2420-32-01024, Issue 7, *Facilities (Morton-Thiokol-Owned); Declaring Excess and Disposing of* (July 10, 1986)
- Morton Thiokol, Inc., Wasatch Operations, Management Procedure #2410-32-00045, *Excess Property; Sale of* (July 10, 1987)

- Rahkonen-PD Bid Files (see Response #13, below)
- Rahkonen-PD HazMat file

11. **How did Mr. Rahkonen come to be in possession of the materials found at the Site that had Respondent's labels or identification?**

RESPONSE #11: Based on property records, Mr. Rahkonen purchased the materials through a sealed bidding process or, in some cases, a negotiated sale, as explained in Response #10, above. Respondent is not aware of any other method through which Mr. Rahkonen came to be in possession of materials with Respondent's labels or identification, and based on Thiokol policies during Mr. Rahkonen's employment, Mr. Rahkonen would not have been permitted to remove materials from Thiokol's facilities without purchasing them through the surplus property sales.

Individuals consulted: George Gooch, Kevin Thackeray, Steve Bradley, Brad Cragun, Kerry Coleman

Documents consulted:

- Rahkonen-PD Bid Files
- Rahkonen Personnel File
- Morton-Thiokol, Inc., Wasatch Operations, Management Procedure #2410-22-32-00005, Issue #12, *Gate Passes; Request and Issuance of* (May 6, 1986)
- Morton-Thiokol, Inc., Wasatch Operations, Management Procedure #2420-22-02, Issue #13, *Customer-Owned Property* (July 1, 1987)

12. **Was management at Respondent aware that Mr. Rahkonen had in his possession materials from Respondent? If yes, please identify those managers.**

RESPONSE #12: Mr. Rahkonen's name and the name of his company, Propulsion Dynamics, are listed in the bid records for sale of surplus materials, indicating that company personnel were aware that he purchased materials. Employees in the Property Department would have overseen and reviewed these purchases. Managers listed on correspondence related to the hazardous material survey conducted on Propulsion Dynamic's storage facility in late 1981 were also presumably aware of Mr. Rahkonen's purchases of surplus materials.

Individuals consulted: George Gooch, Kevin Thackeray, Steve Bradley, Brad Cragun, Kerry Coleman

Documents consulted:

- Rahkonen-PD Bid Files
- Rahkonen-PD HazMat File

13. **If Mr. Rahkonen purchased materials from Respondent, please provide dates of purchase, amounts purchased, name of material purchased and provide all records of sales.**

RESPONSE #13: Based on property records, Mr. Rahkonen and his company, Propulsion Dynamics, purchased surplus government-owned and company-owned supplies, equipment and raw materials from Thiokol through a sealed bidding process on several occasions between approximately November 1963 and February 1997. A spreadsheet summarizing Mr. Rahkonen's and Propulsion Dynamics' successful bids for surplus materials is included with this Response, along with a spreadsheet of items on which Mr. Rahkonen or Propulsion Dynamics submitted bids that were unsuccessful. A representative selection of bid files

where Mr. Rahkonen or Propulsion Dynamics purchased hazardous chemicals and other materials have also been included with this Response (in selecting files, emphasis was placed on selecting files involving hazardous chemicals). As noted in Response #10, above, Mr. Rahkonen also purchased material through direct negotiated in 1980 and 1981. Shipping memos for those purchases are included with this Response.

Individuals consulted: Spreadsheet summarizing bid files prepared by Property Management Team under direction of Loril Stephens.

Documents consulted: Rahkonen-PD Bid Files (includes summary spreadsheet)

14. Was Mr. Rahkonen allowed to take materials from Respondent for his own use or sale without purchase?

RESPONSE #14: Any removal of materials from Thiokol facilities for Mr. Rahkonen's own use or sale without purchase would have been a violation of company policy. The files reviewed and information collected by Respondent do not indicate any instances where Mr. Rahkonen attempted to or was allowed to remove materials from Thiokol's facilities for his own use or sale without purchase. Thiokol required issuance of gate passes for temporary movement of materials off of Thiokol property for business purposes, security performed regular vehicle checks at the gates to verify that no equipment or material was transported off of Thiokol property without a corresponding gate pass, and inventory checks on materials were conducted on a regular basis. Property Management was responsible for investigating and reporting of all loss, damage, or destruction of property, and Security was responsible for the investigating theft or suspected theft of property. Respondent has identified no records indicating that Mr. Rahkonen or Propulsion Dynamics was allowed to take materials from Thiokol through any process other than the surplus property purchase process discussed above.

Individuals consulted: George Gooch, Kerry Coleman, Loril Stephens

Documents consulted:

- Morton Thiokol, Inc., Wasatch Operations, Management Procedure regarding Gate Passes; Request and Issuance of (May 6, 1986)

15. Did or does Respondent allow other employees to take materials from Respondent for their own personal use?

RESPONSE #15: No employees were or are currently allowed to take or remove materials from the plant for personal use, as described in Response #14 and the cited corporate policies. Employees were, however, eligible to bid on materials in the company excess property sales up until that practice was discontinued in 2001 and would have been authorized to purchase and remove material through that sale process as Mr. Rahkonen did, provided they were reviewed and identified as approved bidders for hazardous materials.

Individuals consulted: Kerry Coleman

Documents consulted:

- Morton Thiokol, Inc., Wasatch Operations, Management Procedure regarding Gate Passes; Request and Issuance of (May 6, 1986)

- ATK Propulsion Systems Management Policy SC-D, Issue #3, *General Plant Access* (June 1, 2012)
- ATK Propulsion Systems Management Procedure PT-A01, Issue #3, *Property Management* (Mar. 10, 2006)
- ATK Propulsion Systems Management Procedure PT-A03, Issue #3, *Reporting Lost, Theft, Damaged and Destroyed (LTD&D) Property* (May 31, 2012)

16. **Did or does Respondent sell materials, like the materials sold to Mr. Rahkonen, to the general public?**

RESPONSE #16: Invitations to Bid through the sealed bidding process were sent to past clientele, DCMA Plant Clearance Officer recommended clientele, and, if this list did not generate three or more bidders, to additional potential bidders identified through phone book listings or other media. For government-owned property, the Invitation for Bid List required DCMA Plant Clearance Officer approval. Bidding on hazardous materials was restricted to a list of approved bidders with use for and experience in handling those materials. After passage of the Resource Conservation and Recovery Act and associated regulations, bidders on the approved bidder list were also required to provide their EPA identification number on all bids for hazardous materials. Thiokol stopped selling surplus chemicals through the auction process when federal government regulations on sale of surplus property changed in the wake of September 11, 2001.

Individuals consulted: Loril Stephens

Documents consulted:

- Thiokol Surplus Property Policies (listed in Response #10)
- Rahkonen-PD Bid Files
- ATK Propulsion Systems Management Procedure PT-N02, Issue #2, *Sale of Excess Property* (Oct. 14, 2004)

17. **Was the material Mr. Rahkonen received from Respondent by purchase, or otherwise, considered surplus, excess or waste material?**

RESPONSE #17: The material that Mr. Rahkonen and Propulsion Dynamics purchased from Thiokol consisted of surplus government-owned or Thiokol-owned supplies, components, raw materials, and equipment sold via a sealed bidding process or, in some cases, negotiated sale, in accordance with the Federal Property and Administrative Services Act of 1949 (promoting the "greatest use of excess property," *id.* § 483(a)(1)), federal procurement regulations, federal government contract requirements, and Thiokol policy. The materials sold by Thiokol through this process were not considered waste materials requiring disposal, but rather excess materials with remaining value and use and a known market.

Individuals consulted: George Gooch, Loril Stephens

Documents consulted:

- Rahkonen-PD Bid Files
- Thiokol Surplus Property Policies (listed in Response #10)

18. If not sold or given to Mr. Rahkonen or other employees, what did Respondent do with excess or surplus materials?

RESPONSE #18: As described above, selected excess and surplus materials with a known market were sold using a bid process, as directed by the federal government for government-owned surplus materials or by company policy for company-owned surplus materials. Respondent has found no indication that such materials were provided to Mr. Rahkonen or other employees except through the established purchase processes.

If there was no market for such excess materials, Thiokol policy would have been to properly dispose of the materials. Thiokol followed federal requirements for managing waste material after passage of the Resource Conservation and Recovery Act in 1976 and promulgation of associated regulations. Prior to RCRA requirements, Thiokol disposed waste materials following common industry practices, including land disposal and open burning.

Since the termination of the surplus property auctions after September 11, 2001, any excess hazardous materials that cannot be used under another contract or for another purpose within the company are disposed of as waste, in accordance with the RCRA permit and regulations and upon approval from the DCMA, except that Respondent continues to sell excess materials to reputable, properly licensed brokers or companies (e.g. aluminum powder, photofixer containing silver, and scrap isopropyl alcohol). For example, ATK has purchasing agreements with Dyno Nobel, which provides mixed acid and receives spent mixed acid, and AMPAC, which provides ammonium perchlorate and receives reclaimed ammonium perchlorate.

Individuals consulted: George Gooch, Loril Stephens

Documents consulted:

- Thiokol Notification of Hazardous Waste Activity and Hazardous Waste Permit Application (Apr. 29, 1983)
- Thiokol Management Procedure #2540-35-04007, Issues #1, #2, #3, *Hazardous Materials, Disposal* of (1988-1990) (hereinafter, "Thiokol Hazardous Material Policy")
- Inter-Office Memo from Ron Taylor, Environmental Coordinator, to T.F. Christensen, Process Engineering Supervisor, regarding EPA Requirements, Status Report #3 (Jan. 30, 1981) (Rahkonen HazMat File pp. 1-5)

19. During the time that Mr. Rahkonen worked for Respondent, what were Respondent's waste handling practices?

RESPONSE #19: Following passage of the Resource Conservation and Recovery Act in 1976 and promulgation of associated regulations, Thiokol followed RCRA requirements in its waste handling practices. Prior to RCRA requirements, Thiokol disposed of waste materials following common industry practices, including land disposal and open burning.

Documents consulted: See documents listed for Response #17

20. Did Respondent ever arrange for disposal of any materials with Mr. Rahkonen?

RESPONSE #20: Based on the records identified and reviewed and information gathered in response to this request, and to the best knowledge of Respondent, neither Thiokol nor ATK ever arranged for disposal of any materials with Mr. Rahkonen. Rather, all materials acquired by Mr. Rahkonen or Propulsion Dynamics were surplus equipment, components, supplies, and raw materials acquired through a sealed bidding process or, in some instances, negotiated sale.

Individuals consulted: Loril Stephens, George Gooch

Documents consulted:

- Rahkonen Personnel File
- Rahkonen-PD Bid Files
- Rahkonen-PD HazMat File

21. If a material is determined by Respondent to be excess or waste, what does that mean and what did or what does Respondent do with those materials?

RESPONSE #21: Purchasing records show that from the 1960s until 2001, surplus supplies, equipment, components and raw materials left over after completion of a contract were evaluated to determine whether they had remaining value and use and whether there was a known market for them. If so, the surplus (or excess) materials were sold, as directed by federal procurement regulations, federal contract requirements, and corporate policy. After the RCRA rules were enacted, Thiokol also evaluated excess materials regulated under RCRA to determine whether they would be classified as a waste under 40 CFR 261.2 prior to offering material for sale. Where the excess materials could be used or re-used as ingredients in an industrial process to make a product, or 'as effective substitutes' in manufacture of a product, as was the case with Mr. Rahkonen's Propulsion Dynamics' use of materials in creating model rocket kits and motors, the material was not considered a waste material under 40 CFR 261.2. Where such use was not identified, the excess materials were determined to be a waste and were managed and disposed of as such under Thiokol policies and regulatory requirements.

Individuals consulted: George Gooch, Loril Stephens

Documents consulted:

- Thiokol Surplus Property Policies
- Thiokol Hazardous Material Policies
- ATK Propulsion Systems Management Procedure PT-N02, Issue #2, *Sale of Excess Property* (Oct. 14, 2004)

22. Is it Respondent's usual practice to allow employees to purchase materials?

RESPONSE #22: Respondent has not permitted employees to purchase excess materials regulated under RCRA for several years. During the time period when Mr. Rahkonen and Propulsion Dynamics were purchasing surplus materials from Thiokol, employees were permitted to purchase excess materials, including hazardous materials, if they were on the approved bidders list.

Individuals consulted: George Gooch

Documents consulted:

- Thiokol Surplus Property Policies
- Rahkonen-PD Bid Files

23. **If so, please provide the names of individuals who purchased materials similar to what was sold to Mr. Rahkonen.**

RESPONSE #23: Respondent has identified one other employee who purchased materials from Thiokol, Jay Whimpey, Manager, Manufacturing Engineering, hired July 20, 1987 and retired May 20, 2010.

Individuals consulted: Loril Stephens

24. **Do you have a Records Retention Schedule at ATK? If so, please provide the schedule to the EPA.**

RESPONSE #24: A copy of ATK's Records Retention Policy is included in the documents provided.

Individuals consulted: Olga Siggins

Documents consulted:

- ATK Propulsion Systems Management Procedure #AD-B01, Issue #2, Company Records Retention/Desstruction (Feb. 9, 2011)
- ATK Aerospace Systems Group Records Retention Schedule

25. **What security measures, if any, are in place at Respondent to prevent employees taking chemicals, fuels, propellants and other materials from the workplace?**

RESPONSE #25: By policy, ATK employees are prohibited from removing chemicals, propellants or any other ATK resources/property from ATK sites without express permission. ATK's security department supports this policy by conducting random vehicle inspections at plant exit points at varying times and gates.

Individuals consulted: Kerry Coleman

Documents consulted:

- ATK Propulsion Systems Management Policy SC-D, Issue #3, General Plant Access (June 1, 2012)
- ATK Propulsion Systems Management Procedure PT-A01, Issue #3, Property Management (Mar. 10, 2006)
- ATK Propulsion Systems Management Procedure PT-A03, Issue #3, Reporting Lost, Theft, Damaged and Destroyed (LTD&D) Property (May 31, 2012)



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TARGET SHEET
EPA REGION VIII
SUPERFUND DOCUMENT MANAGEMENT SYSTEM

DOCUMENT NUMBER: 1241797

SITE NAME: HIGHWAY 89 STORAGE UNITS

DOCUMENT DATE: 08/31/2012

DOCUMENT NOT SCANNED

Due to one of the following reasons:

- ☐ PHOTOGRAPHS
- ☐ 3-DIMENSIONAL
- ☐ OVERSIZED
- ☐ AUDIO/VISUAL
- ☐ PERMANENTLY BOUND DOCUMENTS
- ☐ POOR LEGIBILITY
- ☐ OTHER
- ☐ NOT AVAILABLE
- ☐ TYPES OF DOCUMENTS NOT TO BE SCANNED
(Data Packages, Data Validation, Sampling Data, CBI, Chain of Custody)

DOCUMENT DESCRIPTION:

1 CD - ATK Response to 104(e) Request Responsive Documents (CD is
inaccessible)